IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ISAAC PAZ,	
Plaintiff,)) Case No. 1:14-CV-09751
v. PORTFOLIO RECOVERY ASSOCIATES, LLC, Defendant.	Judge: Jorge L. Alonso Magistrate Judge: Maria Valdez

MOTION FOR PROTECTIVE ORDER

Defendant, PORTFOLIO RECOVERY ASSOCIATES, LLC by and through its attorneys, David M. Schultz, Avanti D. Bakane and Lindsey A.L. Conley of Hinshaw & Culbertson LLP, and for its Unopposed Motion for Entry of a Protective Order, states as follows:

- 1. Defendant is preparing its discovery responses to be served upon Plaintiff. These responses reference documents containing Defendant's internal training and operating procedures, and Defendant intends to produce the same.
- 2. In addition, several of the documents to be produced contain personal identifiers and financial information for Plaintiff which is relevant to the claims and defenses at issue.
- 3. Defendant seeks to avoid public disclosure of the aforementioned documentation, as it contains confidential and proprietary material.
- 4. Defendant provided the proposed Model Confidentiality Order of this District to Plaintiff's counsel. Plaintiff's counsel does not oppose the entry of the proposed Order.
 - 5. Defendant requests that this Court enter the proposed Model Confidentiality Order.

WHEREFORE, Defendant, PORTFOLIO RECOVERY ASSOCIATES, LLC respectfully requests that this Court grant its motion for entry of a protective order and for such further relief as this court deems appropriate and just.

Respectfully submitted,

PORTFOLIO RECOVERY ASSOCIATES, LLC, Defendant

/s/ Lindsey A.L. Conley

Lindsey A.L. Conley

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CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2015, I electronically filed with the Clerk of the U.S. District Court, Northern District of Illinois Eastern Division, the foregoing **Defendant's Motion** for **Protective Order** by using the CM/ECF system, which will send notification of such filing(s) to:

Mario Kris Kasalo The Law Office of M. Kris Kasalo, Ltd. 20 North LaSalle Street, Suite 3100 Chicago, IL 60602 E-mail: mario.kasalo@kasalolaw.com

/s/ Lindsey A.L. Conley